

ILLINOIS MARINE TOWING

9. IMT Responsible Carrier Program & Policy
Book excerpts, 2012 Revision

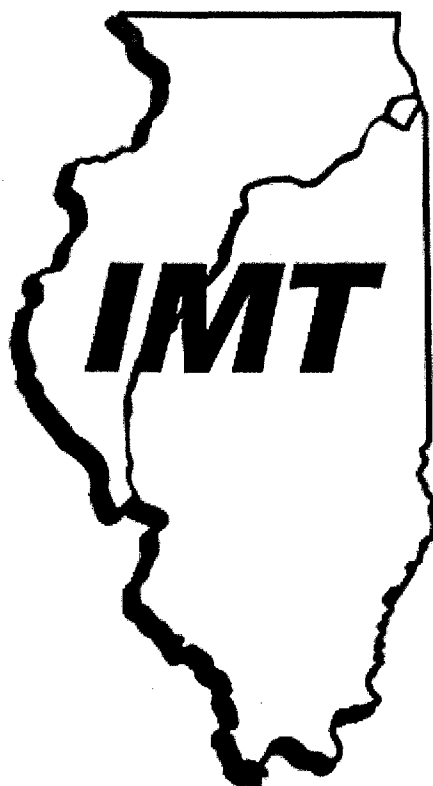
ILLINOIS MARINE TOWING, INC.

RESPONSIBLE CARRIER PROGRAM

AND

POLICY BOOK

2012 REVISION



ENVIRONMENTAL COMPLIANCE POLICY WASTE MANAGEMENT PLAN

A. STATEMENT OF PURPOSE

Illinois Marine Towing, Inc. (IMT), is committed to the environmental integrity of this Nation's natural resources. We all work together to ensure that our day-to-day vessel operations do nothing that results in a pollution incident.

B. ENVIRONMENTAL COMPLIANCE POLICY

IMT's Environmental Compliance Policy includes:

1. A comprehensive environmental sensitivity and compliance program prohibiting pollution and establishing rules and procedures for environmentally responsible operations and conduct at all levels.
2. Education for officers, managers, crew, and shore-based employees to assure that all personnel are aware of environmental laws, regulations and concerns, know how their jobs and operations may affect the environment, and know and comply with policies and procedures for environmentally correct operations.
3. Disciplinary rules for policy violations.
4. Enforcement of the Environmental Compliance Policy through inspections, record keeping and compliance reviews by management representatives and employee cooperation in reporting equipment problems, violations and accidents, which have an environmental impact.
5. Commendations and awards for employees whose suggestions, alertness, reported observations or other assistance helps correct or improve environmental performance.

C. ENVIRONMENTAL COMPLIANCE GUIDELINES

IMT's policy is to comply with all Federal, State, and Local pollution laws and regulations. The laws and regulations prohibit the placement of any pollutant including trash (includes leaving line or lock line scraps), garbage, batteries, discarded food, oil, bilge slop, waste oil, contaminated bilge water, and untreated sanitation into the waterways.

Nothing is to be discharged from or thrown overboard from an IMT vessel except gray water or properly treated sanitary water. Pumping of bilge oil, water, or other vessel waste at any time or place, except at approved locations using methods set forth below is strictly prohibited and constitutes a violation of this policy.

1. Paint products, paint thinners, solvents, and gasoline are not to be placed in the bilge or sanitation system of any vessel. Such products will be safely and securely stored in suitable containers aboard the vessel until disposed of at an approved shore-side facility.
2. All sewage must be processed and treated in the Coast Guard approved Marine Sanitation Device (sewage treatment system) aboard the vessel. In the event of a malfunction of this system, contact the office immediately. No bypass of the system is permitted at any time for any reason. Any such conduct constitutes a violation of this policy.

3. Violations of any of the prohibitions listed above will subject the employee violating the prohibition to disciplinary action including discharge, and may subject both the employee and the IMT to criminal prosecution and/or civil penalties.

D. PROCEDURES FOR DISPOSAL OF BILGE WATER OR WASTE OIL

1. No overboard discharge of bilge oil or bilge water is permitted.
2. Bilge water and waste oil must be retained securely in the vessel's containments, bilge, or bilge oil slop tank until it can be off-loaded at an approved midstream or shore side bilge slop receiving facility. Waste oil and bilge water may be off-loaded only at approved facilities. Bilge water and waste oil should be pumped off at the IMT shop facility. However, pilothouse personnel may contact the General Manager or Port Engineer for a list of other approved facilities. In the event there is a need to off-load at a site not listed or should there be any questions as to the procedure, which should be followed, in a specific circumstance, contact Operations Manager, or Port Engineer, immediately for guidance.
3. Whenever bilge oil or bilge water is discharged or off-loaded the Captain or Pilot on watch is responsible for seeing that a Waste Disposal Log form is filled out recording the following information:
 - e. Date,
 - f. Time,
 - g. Location,
 - h. Description and quantity (water and oil, waste oil, water), and
 - i. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and quantity and be maintained by the Captain.

E. DISPOSAL OF FUEL FILTERS, OIL FILTERS, AND RAGS

1. All fuel filters, sufficiently drained oil filters, and oily rags must be disposed of by placing them in oil waste bags provided on board. These bags are to be off-loaded only at approved facilities. Fuel filters, oil filters, and rags should be disposed of at the IMT shop facility in Joliet. However, pilothouse personnel may check with the General Manager or the Port Engineer for a list of other approved facilities. If for any reason there is any question as to how to properly dispose of such items, contact the Port Engineer, or Operations Manager.
2. Each time oil waste bags are disposed of a Waste Disposal Log form must be filled out. The Captain aboard each vessel will be responsible for seeing that the waste disposal log is properly filled out. Information in the log will include:
 - a. Date,
 - b. Location,
 - c. Method of disposal,
 - d. Number of bags disposed of,
 - e. Content of bags (number and type of filters, etc.), and
 - f. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and

quantity and be maintained by the Captain.

F. USED PAINT PRODUCTS, SOLVENTS, AND GASOLINE DISPOSAL PROCEDURES

1. All solvents, paints, thinners, gasoline, or other cleaning or painting waste products must be properly stored on board in a special containment devices such as a five gallon can or 55 gallon drum, labeled as "Hazardous Waste" for disposal as hazardous waste, at a proper facility. Hazardous waste must be disposed of at approved facilities. Hazardous waste should be disposed of at the IMT shop facility in Joliet. However, pilothouse personnel may check with the General Manager, Operations Manager, or the Port Engineer for a list of other approved facilities.
2. Under no circumstances are any such products to be:
 - a. Dumped overboard or thrown into the river or on the river bank.
 - b. Placed in the bilge or sanitary system. Disposal of any such products other than as set forth above is strictly prohibited.
3. Each time hazardous waste is disposed of a Waste Disposal Log form must be filled out. The Captain aboard each vessel will be responsible for seeing that the waste disposal log is properly filled out. Information in the log will include:
 - a. Date,
 - b. Location,
 - c. Method of disposal,
 - d. Number of bags disposed of,
 - e. Content of bags (number and type of filters, etc.), and
 - f. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and quantity and be maintained by the Captain.

G. GARBAGE AND SOLID WASTE DISPOSAL PROCEDURES

1. All food related garbage will be packaged securely in suitable trash bags and stored on the vessel until it can be disposed of at an approved facility. All food related garbage should be disposed of at the IMT shop facility in Joliet. However, pilothouse personnel may check with the General Manager, Operations Manager, or the Port Engineer for a list of other approved facilities. No garbage or solid waste will be discharged into the river or thrown onto the riverbank at any time.
2. All trash and other solid waste will be stored in the storage area provided for this purpose until it can be discharged at a proper receiving facility. A list of approved facilities is located in the pilothouse.
3. Each time solid waste or edible garbage is discharged at a receiving facility, a Waste Disposal Log form must be filled out. The Captain is responsible for insuring that the log is properly filled out. Information in the log will include:
 - a. Date,
 - b. Location,
 - c. Method of disposal,
 - d. Number of bags disposed of,
 - e. Content of bags, and
 - f. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and quantity and be maintained by the Captain.

H. DISPOSAL OF ITEMS MADE OF PLASTIC, SCRAP LEAVING LINES, ETC.

1. All items made of plastic, scrap leaving lines, etc. will be packaged securely in suitable trash bags and stored in the storage area provided for this purpose. No plastic or scrap leaving line will be discharged into the river or thrown onto the riverbank at any time.
2. All plastic scraps and scrap leaving line are stored in the storage area provided for this purpose until it can be discharged at a proper receiving facility. All plastic scraps and scrap leaving line should be disposed of at the IMT shop facility in Joliet. However, pilothouse personnel may check with the General Manager, Operations Manager, or the Port Engineer for a list of other approved facilities.

3. Each time bags containing plastic or scrap leaving line are discharged at a receiving facility, a Waste Disposal Log form must be filled out. The Captain is responsible for insuring that the log is properly filled out. Information in the waste disposal log will include:
 - a. Date,
 - b. Location,
 - c. Method of disposal,
 - d. Number of bags disposed of,
 - e. Content of bags, and
 - f. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and quantity and be maintained by the Captain.

I. BIO-HAZARDOUS/MEDICAL WASTE DISPOSAL

1. All bio-hazardous/medical waste must be securely packaged in properly marked disposal bags and stored in the designated storage area until off-loaded at an approved facility. Bags of bio-hazardous/medical waste may be off-loaded only at approved facilities. All bio-hazardous/medical waste should be disposed of at the IMT shop facility in Joliet. However, pilothouse personnel may check with the General Manager, Operations Manager, or the Port Engineer for a list of other approved facilities. Bio hazard bags are located in the bloodborne pathology kits aboard each vessel.
2. Each time bags containing bio-hazardous/medical waste are discharged at a receiving facility, a Waste Disposal Log form must be filled out. The Captain is responsible for insuring that the log is properly filled out. Information in the log will include:
 - a. Date,
 - b. Location,
 - c. Method of disposal,
 - d. Number of bags disposed of,
 - e. Content of bags, and
 - f. Written receipts should be obtained from the midstream or shore side facility at which this material is transferred. Those receipts will clearly describe the material and quantity and be maintained by the Captain.

J. VESSEL SEWAGE MANAGEMENT

1. All sewage must be processed and treated in the U.S. Coast Guard approved marine sanitation device (sewage treatment system) aboard the vessel. In the event of a malfunction of this system, contact the office immediately. No bypass of the system is permitted at any time for any reason. Any such conduct constitutes a violation of this policy.
2. The U.S. Coast Guard certified marine sanitation device must at all time, be operated and maintained in accordance with the manufacturer's guidelines.
3. The vessel Captain is responsible for insuring that the manufacturers' guidelines are followed and the system is operated and maintained in accordance with these guidelines.

K. WASTE DISPOSAL LOG

For a copy of the Illinois Marine Towing, Inc., "Waste Disposal Log" form, please refer to the *forms file*.

CONTINGENCY PLAN: Hazardous Spill Response

A. INTRODUCTION

When Congress passed the Oil Pollution Act of 1990, transporting oil on our nation's waterways changed. One such change requires that those who transport oil or hazardous substances plan "for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil or a hazardous substance. For a copy of the Oil Pollution Act of 1990, see section L.

We believe that it is our responsibility to be as prepared as practicable for any contingency in which our vessels and crew may be involved in an incident covered under the Oil Pollution Act of 1990 or the Federal Water Pollution Control Act.

This response plan shall:

- Be consistent with the National Contingency Plan and Area Contingency Plans;
- Designate an individual having authority to implement removal actions;
- Require communication between that individual and the appropriate Federal, State and local officials;
- Identify and ensure by contract or other means approved by the General Manager of this company the availability of private personnel and equipment necessary to remove to the maximum extent practicable a worst case discharge (including a discharge resulting from fire, explosion, or sinking) and to mitigate or prevent a substantial threat from such discharge;
- Require the immediate communication between the designated person and the identified resource group;
- Describe the training, equipment testing, periodic unannounced drills, and response actions of persons on the vessel to be carried out under the plan to ensure the safety of the vessel and crew and to mitigate or prevent a substantial threat of discharge;
- Be updated periodically; and
- Be resubmitted for approval with each significant change.

B. IMPLEMENTING AND MAINTAINING THE PLAN

It shall be the responsibility of the designated IMT spill coordinator to implement and maintain this plan. The IMT spill coordinator will verify, update, and maintain all information in the plan, including section J. Whenever required or necessary, he/she will secure, agreements with contractors capable of successfully responding to and cleaning up a "worst case scenario spill" in all geographical areas of IMT operations. For copies of contractor agreements, see section L. The IMT spill coordinator will also assure that all copies of the plan are corrected when changes are made and assure that all personnel who are assigned any responsibilities under the plan are familiar with those responsibilities and properly trained to perform their duties. The Spill Coordinator uses the, *Revision History* form to document the plan changes. A copy of the form is maintained in the office's forms inventory.

It will be important that Federal, State, and local officials responding to a spill know who has the authority to make decisions on behalf of IMT. Initially, the vessel captain will have the authority to make decisions on the scene. The vessel captain should make every effort to consult with the IMT Spill Coordinator and Response Team Leader when and if practical. In the absence of this consulting opportunity, the vessel captain's authorities are outlined later in this manual. Once the Response Team arrives on scene, the Team Leader will be IMT's representative "in charge" and will have the authority to make all decisions.

C. PURPOSE AND OBJECTIVES

1. Purpose

The intent of this plan is to provide a policy for reporting, containment, and clean up of all hazardous substances spilled into U.S. waterways. Further, this policy is intended to provide guidance and efficient and responsible actions for ILLINOIS MARINE TOWING, INC. (IMT) employees to be taken that will minimize harm to crewmembers, equipment, and the environment.

2. Objectives

- a. To provide quick, efficient action to minimize the effect of any hazardous substance discharge into the navigable waters of the United States.
- b. To outline clear and concise reporting procedures to IMT employees and government officials.
- c. To identify and outline vessel crew and response team duties to ensure an efficient and responsible course of action.
- d. To provide a ready list of names and telephone numbers of those personnel listed within the reporting and response channels of communication.

D. INITIAL RESPONSE AND NOTIFICATION PROCEDURES

1. Captain of Vessel Involved in Incident

When an incident occurs which results in the spill of oil or hazardous substances into the waterway or may result in such a spill, the Captain should:

- a. Do everything possible to secure the immediate safety of the crew and vessel.
- b. Once the crew and vessel are secure, begin to determine the extent of the spill and all possible response actions to be taken by the crew.
- c. After this assessment, the Captain should begin the notification of authorities listed below.
- d. Make immediate contact with:
 - 1). The National Response Center (NRC) at 1-800-424-8802,
 - 2). The nearest U.S.C.G. office (see, section J.1., *Oil Spill Notification Contact Information*, U.S. Coast Guard Marine Safety Offices),
 - 3). The IMT office or office personnel, if after hours, and
 - 4). Where required, appropriate state and local authorities (see, section J. 2., *Oil Spill Notification Contact Information*)

Note 1: The Captain will have the responsibility for recording in writing the time and name of each person contacted. (For a copy of the form, please refer to the, *Vessel Procedure Forms Book*.)

Note 2: In making his/her report, the Captain will provide the information outlined in the, *National Response Center Incident Report Form* in the, *Vessel Procedure Forms Book*.

Note 3: An IMT Vessel Captain will have the authority, in the absence of immediate guidance from the Response Team Leader, to commit up to \$25,000 with contractors in containment and cleanup activities.

2. IMT Office Person who Receives Initial Information

When the office is notified by the vessel Captain of a hazardous discharge, the office employee receiving this information immediately contacts the parties that were not previously notified by the Captain. Those parties may include:

- a. The National Response Center (NRC) at 1-800-424-8802 to verify that the incident has been reported.
- b. The nearest U.S.C.G. office (See, section J.1.) to verify that the incident has been reported.
- c. The IMT Spill Coordinator:

Robert Barnes

Office: 1-630-257-3400, extension 12

Home Mobile: 1-630-846-3412

Note: Either the IMT Spill Coordinator or the Alternate Spill Coordinator will be accessible 24 hours a day, seven days a week. IMT. Office employees will know how to contact these individuals at all times.

3. IMT Spill Response Coordinator

As soon as the IMT Spill Response Coordinator receives information about the discharge, he will immediately contact:

- a. The parties that were not previously contacted (by the Captain or the IMT office person who received the Captain's call). The parties may include:
 - 1). The National Response Center (NRC) at 1-800-424-8802 to verify that the incident has been reported.
 - 2). The nearest U.S.C.G. office (See, section J.1.) to verify that the incident has been reported.
- b. Those for whom he/she has primary responsibility to call:

Appropriate State and local officials (See, section J.2.)

William Contos, Port Engineer, and Assistant Response Team Leader

Shop: 1-815-722-8842

Home: 1-815-725-5587

Mobile: 1-630-846-3403

Meg Moore, AON Risk Services of Missouri, Inc.

24 Hr. Telephone: 1-314-721-5100

Water Quality Insurance Syndicate

24 Hr. Office: 1-800-736-5750

CBC Legal Dept??

The IMT Spill Response Coordinator will assist with logistics, media and public inquiries, and provide general support to the Response Team.

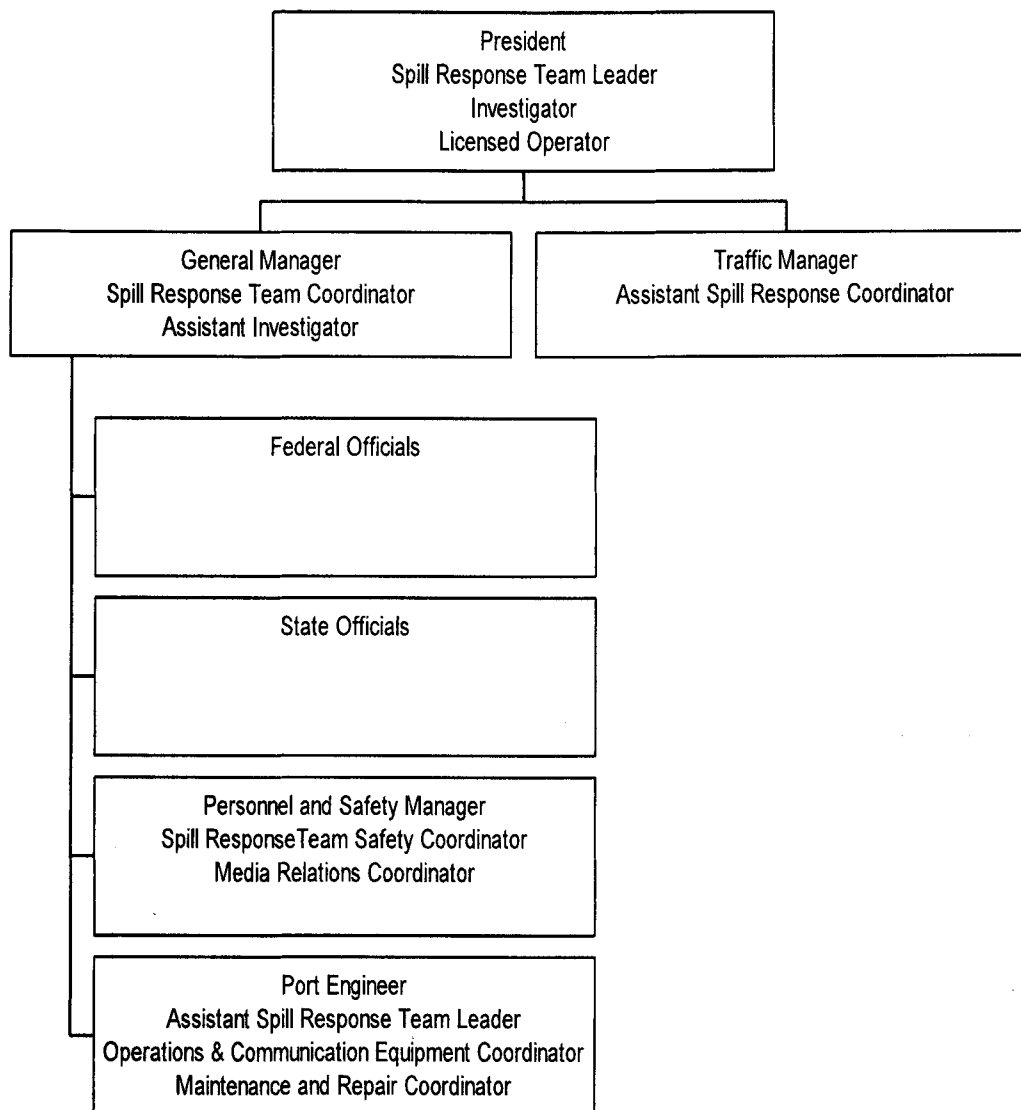
The IMT Spill Response Coordinator will maintain a reference file of spill cleanup contractors or organizations and agreements with those contractors or organizations for the cleanup of spills in IMT's area of operations.

Working with the Response Team Leader or the Vessel Captain (if the Response Team Leader cannot be on the scene in a reasonable amount of time, the IMT Spill Coordinator will begin notifying contractors to provide for the efficient and expeditious containment and cleanup of the spill and to support such activities. (For a list of clean-up contractors available in various states, see Section J.3. and Section K. for pre-arranged contracts.)

As soon as the Response Team is assembled, the IMT Spill Coordinator will dispatch the Team to the scene of the incident.

E. SPILL RESPONSE TEAM TABLE OF ORGANIZATION

Response Team Organization Chart



ON-SCENE RESPONSE TEAM ASSIGNMENTS

Team Leader:	General Manager
Response Coordinator	General Manager
Assistant Response Coordinator	Traffic Manager
Alternate Response Coordinator	Traffic Dept Mbr
Operations Assistant:	Port Engineer
Alternate Operations Assistant:	M/V Deckhand
Assistant Team Leader:	Port Engineer
Safety Coordinator	Safety Manager
Alternate Safety Coordinator:	M/V Deckhand
Communications Equipment Coordinator:	Port Engineer
Alternate Communications Equipment Coordinator:	M/V Pilot
Media Relations Coordinator:	General Manager
Investigator:	General ManagerAlternate
Investigator: Safety ManagerM/V Captain	
Maintenance and Repair Coordinator:	Port Engineer
Alternate Maintenance and Repair Coordinator:	M/V Deckhand
Acquisitions Coordinator:	Port Engineer
Alternate Acquisitions Coordinator:	M/V Deckhand
Licensed Operator:	M/V Captain
Alternate Licensed Operator:	M/V Pilot

F. RESPONSE TEAM EQUIPMENT RESOURCE LIST

The following list of spill resources will be maintained by the Response Team or be immediately available from a contractor to be carried to the spill site:

<u>Quantit</u>	<u>Item</u>	<u>Quantit</u>	<u>Item</u>
<u>Y</u>		<u>Y</u>	
4 ea	Protective clothing kit	2 bx	Light sticks (10 each)
2 ea	Hazard material tarp (yellow)	1 ea	Mini Kota Trolling Motor
1 ea	Spare tire	1 ea	Bloodborne Pathogen Kit
1 ea	1/2 line (500 ft)	4 ea	Stowaway Suit
1 ea	Coleman Powermate Generator	1 ea	First Aid Kit
2 ea	Sorbent Pads (pks)	4 ea	MSA Confo Classic Face piece
1 ea	Mini Kota On Board Battery Charger	4 ea	High impact chemical splash goggles
2 ea	Containment Boom 100 feet (yellow)	1 bx	Light Duty dust mask
4 ea	Protective footwear	1 bx	MSA Chemical Cartridges
1 bg	M-80 16" x 100' sweep oil only	4 ea	Respirator storage bag
1 ea	Heavy duty work light	1 ea	Harard Material yellow caution tape
1 ea	Duracell Batteries AA	1 ea	5 lb Type 1 Fire Extinguisher
2 ea	Fast Pack Spill Kit (ENPAC)	1 ea	20 lb Type III Fire Extinguisher
4 ea	Hard hat	1 ea	Broom
2 ea	Heavy duty extension cord (100ft)	2 ea	Plastic non sparking shove
8 ea	Sol-Knit Green rubber gloves	2 ea	Steel Rake
1 ea	Rubbermaid 32 gal container	1 ea	12 ft. Pike Pole
1 ea	Duracell Batteries AA	1 ea	55 Gal Spill Kit
2 ea	Orange safety vest	2 ea	Marine Battery with boxes
2 ea	Responder 2AA flashlight, yellow	12 ea	White Hooks
2 ea	Duct tape	1 ea	MSDS Book with Basket

G. RESPONSE TEAM JOB DESCRIPTIONS

Upon activation, the Response Team will proceed directly to the location of the incident. The Illinois Marine Towing, Inc., Response Team may have one member performing several tasks given specific conditions at the time. Contractors may also serve as Response Team members. The Illinois Marine Towing, Inc., Response Team members will have the following responsibilities:

1. Team Leader:

The Team Leader has the authority to make decisions on behalf of the IMT and is responsible for the entire cleanup operation. Until relieved by the Team Leader, the vessel captain will have decision making authority on behalf of the IMT. The Team Leader should be the IMT's most knowledgeable employee in spill containment and cleanup. He will decide what personnel and resources are necessary for the efficient and adequate cleanup of the spill. He will serve as liaison between Federal, State and local agencies and will maintain contact with the IMT Spill Coordinator in the Lemont Office throughout the cleanup operation. The Team Leader will ensure that each vessel and the Response Team maintain adequate resources for spill containment and cleanup.

2. Response Coordinator:

The Response Coordinator uses appropriate communication equipment to work with the Team Leader and other team members to orchestrate the spill response efforts. Under the Team Leader's direction, the coordinator facilitates the office support for the on-site team and provides contact with various governmental agencies and service providers and whatever other duties the Team Leader assigns to him/her.

3. Assistant/Alternate Response Coordinator:

The Assistant Response Coordinator provides support to the Response Coordinator and executes all assigned duties. In the Response Coordinator's absence, the Assistant Response Coordinator acts as the Alternate Response Coordinator and assumes the Response Coordinator's duties.

4. Operations Assistant:

The Operations Assistant will assist the Team Leader with coordination of contractors, acquisition of necessary equipment and supplies, assurance that all safety procedures are implemented on the scene. The Operations Assistant will also ensure that adequate communications are established. The Operations Assistant will have the direct responsibility for ordering and maintaining Response Team equipment resources.

5. Acquisitions Coordinator:

The Acquisitions Coordinator will maintain cost control over purchases and contracts, i.e. purchase orders for supplies and other on-scene purchases.

6. Safety Coordinator:

The safety coordinator will be responsible for the safety of the cleanup crew and for coordinating the use of protective clothing, respiratory devices, toxic monitoring and first aid.

7. Communications Equipment Coordinator:

The Communications Equipment Coordinator will be responsible for providing adequate communications systems on-scene so as to allow for continuous communication between the Team Leader at the spill site, the Lemont Office, contractors, Federal, State and local officials. Communication equipment might include marine radios, cellular telephone, pagers, and walkie talkies.

8. Media Relations Coordinator:

The Personnel or Safety Manager will serve as the on-scene Media Relations Coordinator. No statement by a member of the vessel crew, the Response Team or contractor will be made to the media without prior authorization by the Response Team Leader. In advance of interviews, the Media Relations Coordinator will prepare facts and circumstances regarding the incident, as well as deaths and injuries resulting from the incident, and Illinois Marine Towing, Inc.'s response. He should have prepared answers to anticipated questions and should be familiar with legal ramifications of certain answers.

9. Investigator:

The investigator will gather evidence and statements to obtain as much information as possible as quickly as possible following the incident in order to determine the immediate cause and facts surrounding the incident. The investigator will have on-scene adequate recording equipment such as VCR, camera and tape recorder.

10. Maintenance and Repair Coordinator:

The Maintenance and Repair Coordinator will provide drawings of the vessel and provide technical expertise with regard to discharge and salvage.

11. Licensed Operator:

The vessel captain will serve as the licensed operator. In his/her absence due to disability, impairment or other on-site responsibilities, the vessel pilot will serve in this position. The licensed operator will move the vessel as required.

H. EMERGENCY RESPONSE PROCEDURES

1. Assessment of Situation

Upon discovery of a spill or situation that might lead to a spill or loss of cargo, the vessel captain should do everything possible to protect and secure the crew, the vessel and if practical, the environment. He should identify the product and its potential hazard to persons on the scene and the general public. The location, type of environment, weather conditions, existence or threat of fire or explosion, and the condition and stability of the vessel are all important factors in determining proper, efficient and expeditious cleanup procedures. All of these factors should be assessed by the vessel captain and passed on the appropriate authorities and the Lemont Office.

If fire or the threat of fire exists, local fire and police should be notified immediately by the vessel Captain.

Notification of the appropriate authorities is critical. Failure to do so can result in serious fines and in some cases, imprisonment, but the safety of the crew, the general public, and the stability of the vessel must always be the first priority of the vessel captain.

2. Possible Actions by the Crew to Mitigate the Spill

If the spilled substance is not hazardous and the vessel is secure, efforts should be made by the crew, where and when practical and safe, to contain the spill with whatever equipment resources might be available on board the vessel. Such equipment might include absorbent pads for deck spills, and on board boom placed around the vessel or the damaged part of the vessel. Of course, in a "worst case" spill, it is not expected that the vessel will have sufficient resources to contain the spill. In this case, the crew will rely on the Response Team and outside contractors. Above all, safety of the crew and vessel will have the highest priority and must be considered before any decision is made by the vessel captain to begin efforts to mitigate the spill.

3. Logistics

Once on scene, the Response Team will establish a Field Response Command Post with proper communication equipment to maintain contact with Federal, State and local officials as well as the Lemont Office.

Working with the IMT Spill Coordinator, the Operations Assistant and the Acquisitions Coordinator, the Response Team Leader will begin securing cleanup contractors, acquiring necessary equipment and supplies, and arranging for transportation, housing and support of all personnel involved in the cleanup.

4. Response

The Operations Assistant will supervise the establishment of necessary safety procedures and proper communications structure and working with contractors, identify the more sensitive and/or critical areas of requiring cleanup.

Note: If the spill will require more than seven days to clean up, it may be necessary to rotate crews, coordinators, and the team leader.

5. Post-Spill Evaluation

After any incident, which requires the activation of the Response Team, an evaluation of the response will be conducted. The evaluation will be led by the Team Leader who will involve the vessel crew, the person in the Lemont Office who received first notification of the incident, the IMT Spill Coordinator and members of the Response Team. This group will review what worked and what didn't in the Spill Response Plan. Where appropriate, the plan should be amended. The IMT Spill Coordinator will have the responsibility for incorporation the evaluation into any appropriate changes.

6. Changes to the Plan

When the plan is changed, sufficient copies of the changes will be made and distributed to all persons who have copies of the plan. Each person receiving a plan change will have the responsibility of updating his or her copy of the plan and recording the change on the "Record of Change" page located in Section L.

7. Distribution of the Plan

The following persons will have copies of the plan and understand the chain of communication established in the plan:

- a. The Captain of each vessel,
- b. All Lemont Office employees who might receive a "spill" call from a captain,
- c. The IMT Spill Coordinator and alternate,
- d. IMT's top officers,
- e. IMT's legal advisor and insurance representative, and

- f. All members of the Response Team and their alternates.

8. Spill Response Practice Drills

Periodically, the IMT Spill Coordinator will conduct an unannounced drill. This drill will include the vessel captain contacting the IMT office, activation of the Response Team, and testing and inspection of all spill response equipment. Following each drill, an evaluation will be led by the IMT Spill Coordinator.

Additionally, the IMT Spill Coordinator will periodically visit vessel captains and crews to test their knowledge of the plan and awareness of spill prevention and communication procedures.

These drills will serve as training for those who play a crucial role in the response plan. The plan will also become part of a new employee's orientation.

Captains will be responsible for assuring that their crews are adequately briefed on the requirements of the plan.

The IMT Spill Coordinator will be responsible for assuring that Captains, Lemont Office employees, and all Response Team members are adequately trained in the requirements of the plan. In addition, the IMT Spill Coordinator will brief all employees on how to properly refer to the media coordinator questions from the press or general public.

I. OIL SPILL NOTIFICATION CONTACT INFORMATION (800) 424-8802

1. U.S. COAST GUARD MARINE SAFETY OFFICES

Chicago, IL, 555A Plainfield Rd Willowbrook, IL	630 - 986 - 2155
New Orleans, LA, 201 Hammond Hwy, Metairie	504 - 589 - 6261
Morgan City, LA, 800 David Drive, Room 232	985 - 380 - 5320
Port Arthur, TX, 2875 75 th Street	409 - 723 - 6501
Houston, TX, 9640 Trenton Drive	713 - 671 - 5100
Corpus Christi, TX, 555 N. Caranahua St, Suite 500	361 - 888 - 3162
Louisville, KY, 600 Martin Luther King Jr. Pl, Rm 402D	502 - 779 - 5400
St. Louis, MO, 1222 Spruce Street	314 - 269 - 2500
Pittsburgh, PA, 100 Forbes Avenue, Room 1150	412 - 644 - 5808
Memphis, TN, 200 Jefferson Avenue, Room 1301	901 - 544 - 3941
Paducah, KY, 225 Tully	270 - 442 - 1621

2. STATE EMERGENCY MANAGEMENT AGENCIES

ILLINOIS	217-782-7860
INDIANA	317-233-7745
MISSOURI	573-634-2436

3. SPILL CLEAN-UP CONTRACTORS (alphabetical order by state)

ILLINOIS

Heritage Environmental Services, Inc.
Lemont, Illinois 60439
Response Office - 630-739-1151

INDIANA

Marine Industries Corporation
Jeffersonville, IN
800-733-3130
Timco Industries
New Albany, IN
812-945-8988

MISSOURI

Heritage Environmental Services, Inc.
St. Louis Response Office
314-388-3500

AREAS OF OPERATION AND PRE-ARRANGED AGREEMENTS

Illinois Marine Towing currently conducts marine towing business on the Illinois Waterway System.

At the present time, there are no pre-arranged agreements.

J. OIL POLLUTION ACT OF 1990 SUMMARY

This Act, Oil Pollution Act of 1990 -- Public Law 101-380 (33 U.S.C. 2701 et seq.; 104 Stat. 484) established new requirements and extensively amended the Federal Water Pollution Control Act (33 U.S.C. 1301 et. seq.) to provide enhanced capabilities for oil spill response and natural resource damage assessment by the Service. It required Service consultation on developing a fish and wildlife response plan for the National Contingency Plan, input to Area Contingency Plans, review of Facility and Tank Vessel Contingency Plans, and to conduct damage assessments associated with oil spills. The following are the pertinent provisions.

Title I, section 1006, provided that Federal trustees shall assess natural resource damages for natural resources under their trusteeship. Federal trustees may, upon request from a State or Indian tribe, assess damages to natural resources for them as well. Trustees shall develop and implement a plan for the restoration, rehabilitation, replacement, or acquisition of the equivalent of natural resources under their trusteeship.

The definition of natural resources damages was amended to include restoration as the basic measure, plus other values. Natural resource damage assessment regulations were promulgated by the National Oceanic and Atmospheric Administration in August 1992. (These regulations replaced Department of the Interior regulations at 43 CFR Part 11 for oil spills only.) Damages collected must be retained in a revolving account for use only to reimburse assessment costs and restore, replace, or acquire the equivalent natural resources.

Title I, section 1011, provides that trustees are to be consulted on the appropriate removal action to be taken in connection with any discharge of oil.

Title I, section 1012, provided for the uses of the oil pollution fund. In addition to response costs, the fund may be used without appropriations to pay the costs of assessments, as well as to pay claims for natural resource damages if there are no funds or insufficient funds from a responsible party. (A claims procedure was developed under section 1013.) This section also stipulated deadlines for the submission of removal cost claims and damage claims.

Title IV, section 4201, amended subsection 311(d) of the Federal Water Pollution Control Act with respect to Federal removal authority. It declared the contents of the National Contingency Plan to consist of a detailed oil and hazardous substance pollution prevention plan, including fisheries and wildlife. The Fish and Wildlife Response Plan was developed in consultation with the Service and the National Oceanic and Atmospheric Administration.

Title IV, section 4202, amended subsection 311(j) of the Federal Water Pollution Control Act with respect to the National Planning and Response System. It defined area committees and area contingency plans, and requirements and deadlines for agencies. Under this section, the Service is required to generate a list of all equipment, including fire fighting equipment, as well as personnel and any other equipment and supplies that could be used to expedite the removal of oil or mitigation of a spill.

Title IV, section 7001, provided for oil pollution research and development. The Service is included in the Interagency Coordinating Committee on Oil Pollution Research, established to research and develop methods to restore and rehabilitate natural resources damaged by oil discharges, and to research and evaluate the relative effectiveness and environmental impacts of bioremediation technologies.

One aspect of particular interest to the Service involves the identification of ecologically sensitive areas and the preparation of scientific monitoring and evaluation plans. Research conducted by the Service is to be directed and coordinated by the National Wetland Research Center.

**FOR A FULL COPY OF THE OIL POLLUTION ACT OF 1990, PLEASE SEE HUMAN
RESOURCES.**